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6 AUG 1971

MEMORANDUM FOR: Chief, Information Services Division, DDP

ATTENTION : Deputy for Information Management

SUBJECT : Retention of Certain Office of Finance Records

REFERENCE : Executive Director-Comptroller's Memorandum
dated 10 June 1971 (ER 71-3488/1),
Subject: Control of the Agency's Records
Storage Growth

1. This memorandum requests DDE/ISD and DDP/CI Staff to re-examine CI's previously stated need to retain certain finance vouchers and accountings in excess of established legal retention periods. These records contain travel accountings as well as operational entertainment and expense vouchers which CI Staff has requested the Office of Finance retain for 30 years, rather than 12 years as prescribed by the U.S. Comptroller General and the Archivist of the United States.

2. As you know, and is emphasized in the referent memorandum, we are seriously limited in terms of available space in the Records Center and these finance records represent the largest category of records holdings in the Records Center chargeable to the DDS. As of 21 July 1971, there were 2,500 cubic feet of headquarters vouchers and field accounting records over 12 years old. In addition to this 2,500 cubic feet, the volume which will become 12 years old and subject to legal destruction during the next 3 years is as follows:

In 1972	- 450 cubic feet
In 1973	- 450 cubic feet
In 1974	- 530 cubic feet

Taking this volume into consideration, as well as newer records accumulations in this category, it is apparent that during the next ten years approximately 500 cubic feet per year could be legally destroyed but for the CI Staff request that they be retained for 30 years.

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3. It is clear that the operational and legal use of these records in the Support Directorate ends when they are 12 years old. This is the largest single collection of records in the Support Directorate and with its annual growth rate of 500 cubic feet the DDS simply cannot live within the 1,000 net cubic feet annual allocation if we cannot destroy these records when they reach the 12-year legal retention period. Additionally, from a cost effectiveness standpoint, long term retention is an ever increasing burden. For example, the 2,500 cubic feet that we could now destroy will occupy new motorized shelving at a capital investment cost of \$15,000 and requires another \$2,500 in annual maintenance costs. If nothing is done this collection would continue to grow at an annual rate of 500 cubic feet, costing \$4,000 in capital investment and overhead charges each succeeding year. By 1979, the first year we could begin to destroy records on the 30-year retention basis, costs would have mounted to \$42,000 in capital investment and over \$41,000 in overhead charges. This appears to be an extremely high price to pay for CI contingency purposes. Conversion to microfilm is an alternative if DDP insists on a 30-year retention basis but this is even more expensive.

4. In re-examining and revalidating the justification for retaining these records 18 years beyond the legal retention period, we urge the following factors be considered:

a. The Agency costs to retain these records for this contingency is conservatively estimated at \$83,000 over the next 8 years alone. Estimated costs to film this collection (assuming DDP/CI could make manpower available) are approximately \$100,000 for the initial 2,500 cubic feet and \$20,000 per annum to film the 500 feet per year growth in these records.

b. The validity of CI Staff's assumptions should be carefully examined. That is, can we indeed rely on these records to provide a detailed reconstruction of travel, assignments, and other operational activity on the part of staff, staff agent and contract personnel? Even if we can, how significant is this "additional" data in relation to information already contained in the extensive operational project files retained in the Clandestine Services records system.

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c. If these records are to be retained longer than the 12-year legal limit to meet the DDP/CI requirement, DDS has no alternative but to charge the volume involved to the DDP space allocation at the Records Center. Office of Finance would retain technical control of the collection but the 2,500 cubic feet which could be legally destroyed now would use up the DDP's annual records space allocation for the next 2 1/2 years unless there are offsetting reductions in the 24,000 cubic feet of DDP records [redacted]. It is significant to note that these records deposits when charged to the DDP would represent 10 percent of the DDP records [redacted]. The justification for retention therefore should be judged in relation to other DDP records retention requirements, forcing a decision on which collections would have to be removed in order to absorb the 2,500 feet within the present records space allocation for the DDP.

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d. CI Staff has previously stated, memorandum dated 8 May 1968 (DDP 8-1896), that frequency of requests for searches of these finance records is not a substantive basis for judging their value. We suggest that in view of the costs of retaining these records and the priority they may have in relation to other DDP records, the use of this collection might now be a significant factor. In this regard, Office of Finance reports that they have no record of a DDP reference request during FY 1970 and 1971 involving accountings that are past the 12-year retention period.

5. We would appreciate the results of your review of this problem by 1 October 1971, in order that we may commence destruction of the collection or if they are to be retained, arrange for these records to be charged against the DDP records storage allocation per referent memorandum.

[redacted]

Chief, Support Services Staff

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